

LEVI & KORSINSKY, LLP

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE TESLA, INC. SECURITIES
LITIGATION

Case No. 3:18-cv-04865-EMC

**STIPULATION AND ~~PROPOSED~~ ORDER
REGARDING LOCAL RULE 7 SETTLEMENT
CONFERENCE**

Pursuant to ADR Local Rule 7, Plaintiff Glen Littleton and Defendants Tesla, Inc., Elon R. Musk, Brad W. Buss, Robyn Denholm, Ira Ehrenpreis, Antonio J. Gracias, James Murdoch, Kimbal Musk, and Linda Johnson Rice (collectively, “Defendants”) (collectively, Plaintiff and Defendants are referred to as the “Parties”), by and through their undersigned counsel of record, submit the following stipulation and proposed order:

1 WHEREAS, at the April 18, 2022 status conference, the Court ordered the parties to meet
2 and confer regarding ADR and stated that the parties should be prepared to discuss ADR at the next
3 status conference;

4 WHEREAS, the Court has scheduled a status conference for July 12, 2022 to specifically
5 discuss progress regarding ADR;

6 WHEREAS, Plaintiff has suggested that the parties engage in a private mediation or a
7 settlement conference pursuant to ADR Local Rule 7;

8 WHEREAS, Plaintiff agrees with the Court that it is appropriate to explore a negotiated
9 resolution to this matter at this time as the Parties have a thorough understanding of the legal and
10 factual issues and risks involved in this action as well as the scope of potential damages that may
11 be awarded at trial;

12 WHEREAS, although Defendants are skeptical the matter can settle given the current
13 posture of the case, in line with the Court's order, they will participate in a settlement conference
14 in good faith;

15 WHEREAS Defendants believe that any such settlement conference should be held after
16 the Court decides the parties "early" motions *in limine*, which are set to be heard on July 28, 2022;
17 and

18 WHEREAS, Plaintiff believes that the settlement conference can proceed at the earliest date
19 that is convenient to the Parties and the Court;

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21 NOW, THEREFORE, the Parties request that this matter be referred to a settlement
22 conference to be conducted under ADR Local Rule 7.
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2 DATED: July 1, 2022

LEVI & KORSINSKY, LLP

3 By: /s/ Adam M. Apton

4 Nicholas I. Porritt (*appearing pro hac vice*)

5 Attorneys for Plaintiff Glen Littleton and Counsel for the
Class

6 DATED: July 1, 2022

QUINN EMANUEL URQUHART & SULLIVAN, LLP

7
8 By: /s/ Alex Spiro

9 Alex Spiro (*appearing pro hac vice*)

10 Attorneys for Tesla, Inc., Elon Musk, Brad W. Buss,

11 Robyn Denholm, Ira Ehrenpreis, Antonio J. Gracias,

12 James Murdoch, Kimbal Musk, And Linda Johnson Rice

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14 **IT IS SO ORDERED.**

15 Dated: July 1, 2022

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HON. EDWARD M. CHEN
United States District Judge